

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
NO. 7:20-CR-167-5M2

UNITED STATES OF AMERICA

v.

JOSEPH MAURINO

**MOTION TO MODIFY TERMS OF
PRE-TRIAL RELEASE**

NOW COMES the Defendant and moves to modify the terms of pre-trial release as follows:

1. The Defendant, having pled guilty, was released following his arraignment on about April 11, 2023 and remains on pre-trial conditions in the District of New Jersey.
2. The Defendant, upon information and belief, has not violated the terms of his pre-trial release while on pre-trial release.
3. The Defendant requests that he be permitted to travel to Nonna's Citi Cucina at 448 US-9, Englishtown, NJ to celebrate a family member's Christening on June 3, 2023 and to leave his house no later than 6:00 pm and return no later than 10:30 pm.
4. The Government does not object to the Defendant's request.

WHEREFORE, the Defendant respectfully moves this Court to temporarily modify the pre-trial conditions as described above.

This the 15th day of May 2023.

/s/ Damon Chetson
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing pleading was served upon opposing counsel by
via CM/ECF.

This the 8th day of May 2023.

/s/ Damon Chetson

Damon J. Chetson

Counsel for the Defendant (Retained)

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